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9 *Attorneys for Plaintiffs*

10 **IN THE DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

11 **ÖZCAN GENÇ, HASAN GÖKÇE, and) Case No. 1:20-CV-00031**
12 **SÜLEYMAN KÖŞ, on behalf of themselves)**
13 **and all others similarly situated,)**

14 **Plaintiffs,)**
15 **) DECLARATION OF ÖZCAN GENÇ**
16 **)**

17 **vs.)**

18 **IMPERIAL PACIFIC INTERNATIONAL)**
19 **(CNMI), LLC, IMPERIAL PACIFIC)**
20 **INTERNATIONAL HOLDINGS LTD., and)**
21 **IDS DEVELOPMENT MANAGEMENT &)**
22 **CONSULTANCY,)**

23 **Defendants.)**
24 **)**

25 **I, Özcan Genç, declare as follows:**

- 26 **1. I am above the age of 18 years and am competent to testify as to the matters stated herein.**
- 27 **2. I am one of the named plaintiffs in this lawsuit.**
- 28 **3. I sent the Court-approved Notice of Pendency of Class Action to İnfoyed Yeminli
Tercüme Bürosu, a professional translation service in Turkey, to be translated into
Turkish.**
- 4. Attached to this declaration as Exhibit 1 is the Turkish translation I received from
İnfoyed, together with the English original.**

- 1 5. At the bottom of page 3 is a signed stamp by which İnfoyed certifies that "the attached
- 2 ENGLISH document is translated into TURKISH and the translation accurately reflects
- 3 the contents and meaning of the ENGLISH original."
- 4 6. Our attorney, Richard Miller, provided me a spreadsheet with the names of 104 Turkish
- 5 nationals who worked for Imperial Pacific.
- 6 7. To the best of my knowledge, no class members are missing from that spreadsheet.
- 7 8. I know the workers' contact information because I was their manager. I am still in contact
- 8 with them.
- 9 9. I inserted their contact information in the spreadsheet that Mr. Miller gave me.
- 10 10. The three supervisors who work for IDS Management Consultancy in Turkey can be
- 11 reached through that company.
- 12 11. To the best of my knowledge, the addresses and telephone numbers I compiled in the
- 13 spreadsheet attached as Exhibit 2 are complete and accurate.
- 14 12. Mr. Miller and I translated this declaration into Turkish using Google Translate, and I
- 15 read the translation before signing.
- 16 13. I declare under penalty of perjury that the foregoing statements are true and correct.

17 Executed on April 28, 2022, in Susupe, Saipan, Commonwealth of the Northern Mariana
18 Islands.



21 Özcan Genç